

**To:** Yamada, Richard (Yujiro)[yamada.richard@epa.gov]  
**Cc:** Fleming, Megan[Fleming.Megan@epa.gov]; Christian, Megan[Christian.Megan@epa.gov]; Kuhn, Kevin[Kuhn.Kevin@epa.gov]  
**From:** Rodan, Bruce  
**Sent:** Thur 2/8/2018 10:34:42 PM  
**Subject:** FW: IOAA's review/concurrence RE: GAO Draft Report: Food Safety: Federal Efforts to Manage the Risk of Arsenic in Rice (GAO-18-199)  
101279 ARSENIC IN RICE DRAFT.PDF  
RE: review/comment: GAO Draft Report: Food Safety: Federal Efforts to Manage the Risk of Arsenic in Rice (GAO-18-199)

Richard,

Another document for your review. Again, I find nothing problematic in this – the comments are from NCEA and are technical suggestions to GAO regarding literature, but nothing controversial. Should be a quick review before moving forward.

Bruce D. Rodan

Associate Director for Science

U.S. EPA, Office of Research and Development

**From:** Fleming, Megan  
**Sent:** Thursday, February 8, 2018 11:10 AM  
**To:** Rodan, Bruce <rodan.bruce@epa.gov>  
**Subject:** FW: IOAA's review/concurrence RE: GAO Draft Report: Food Safety: Federal Efforts to Manage the Risk of Arsenic in Rice (GAO-18-199)

Hi Bruce,

Please see attached for NCEA comments on GAO's draft report on arsenic in rice entitled, Food Safety: Federal Efforts to Manage the Risk of Arsenic in Rice. Can you please review and turn comments around to me by Monday? (Friday would be even better if you can do it.) This will go to Richard and Jennifer next and comments are ultimately due to GAO by next Thursday.

Thanks,

Megan

Megan Fleming

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**From:** Hingeley, Maureen

**Sent:** Tuesday, February 06, 2018 10:36 AM

**To:** ORD-IOAA-Front Office Support <[ORDIOAASUPPORT@epa.gov](mailto:ORDIOAASUPPORT@epa.gov)>

**Cc:** Heckman, Deborah <[Heckman.Deborah@epa.gov](mailto:Heckman.Deborah@epa.gov)>; Cursio, Heather <[Cursio.Heather@epa.gov](mailto:Cursio.Heather@epa.gov)>; Kim, Hyon <[Kim.Hyon@epa.gov](mailto:Kim.Hyon@epa.gov)>

**Subject:** IOAA's review/concurrence RE: GAO Draft Report: Food Safety: Federal Efforts to Manage the Risk of Arsenic in Rice (GAO-18-199)

Good morning,

For the IOAA's review/concurrence are NCEA's minor comments regarding the data used to support GAO's draft report on arsenic in rice entitled, *Food Safety: Federal Efforts to Manage the Risk of Arsenic in Rice*. The comments (listed below) are in reference to the limitations of the health reviews used by GAO to support their findings. NCEA's management delivered the comments (see email attachment). Attached is GAO's draft report.

In a more nuanced analysis of the report, below are NCEA's opinions to offer for GAO's

consideration, at their discretion. In relation to the 14 reviews GAO considered:

- None of the reviews focus on bladder cancer; although not a review, they may want to consider the highly relevant NCI US bladder cancer study (Baris et al, 2016) of “Elevated Bladder Cancer in Northern New England: The Role of Drinking Water and Arsenic”;
- The only lung cancer review, Lamm et al. (2015), presented major issues that we had with bias with respect to study selection and the use of unpublished study data;
- The only CVD review, Phung et al. (2017), focuses on non-US population (Vietnam), which may be a historically high iAs exposure area which (as we have noted in our assessment materials for areas like China, Taiwan and Bangladesh) may not be relevant to low exposed populations like the US;
- Most of the reviews seem to be of studies in high exposure populations;
- There are some highly relevant meta-analyses that we could recommend for their review that came out after June, 2017, particularly the bladder and lung cancer meta-analysis of Lynch et al. (2017, including erratum) and the CVD meta-analysis of Moon et al. (2017).

Please note that **ORD’s comments are due to GAO no later than Feb 16<sup>th</sup>.**

If there are any questions or additional information is needed, please let me know.  
Thank you.

Best,

**Maureen Hingeley**

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